

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-
GUERRA, MICHAEL MAERLENDER, BRANDON
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY
TATIANA WEAVER, and CAMERON WILLIAMS,
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE
OF TECHNOLOGY, UNIVERSITY OF CHICAGO,
THE TRUSTEES OF COLUMBIA UNIVERSITY IN
THE CITY OF NEW YORK, CORNELL
UNIVERSITY, TRUSTEES OF DARTMOUTH
COLLEGE, DUKE UNIVERSITY, EMORY
UNIVERSITY, GEORGETOWN UNIVERSITY, THE
JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS
INSTITUTE OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME DU
LAC, THE TRUSTEES OF THE UNIVERSITY OF
PENNSYLVANIA, WILLIAM MARSH RICE
UNIVERSITY, VANDERBILT UNIVERSITY, and
YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125

Hon. Matthew F. Kennelly

**PLAINTIFFS' MOTION TO SEAL THEIR MOTION TO COMPEL PRODUCTION OF
CERTAIN DONOR REPORTS AND TO COMPEL NORTHWESTERN TO PRODUCE
PRESIDENT MORTON SCHAPIRO FOR TWO ADDITIONAL HOURS
OF DEPOSITION**

Pursuant to the Confidentiality Order in this case (ECF No. 254) and Local Rule 26.2,
Plaintiffs respectfully request that the Court grant this Motion to File Under Seal their
Memorandum of Law in Support of their Motion to Compel Production of Certain Donor Reports

and to Compel Northwestern to Produce President Morton Schapiro for Two Additional Hours of Deposition Testimony and the exhibits cited therein. In support of their Motion, Plaintiffs state as follows:

1. The memorandum at issue discusses, references, and appends certain information designated as Confidential and Attorneys' Eyes Only under the terms of the Confidentiality Order.

2. In accordance with Local Rule 26.2(c), the memorandum at issue will continue to be provisionally under seal, but an unredacted version will be provided to counsel and the Court. In addition, a redacted (public) version will be filed via the ECF system within 14 days.

WHEREFORE, Plaintiffs respectfully request that this Court grant Plaintiffs' motion.

Dated: September 25, 2023

By: /s/Robert D. Gilbert

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Respectfully Submitted,

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